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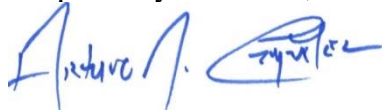
The Honorable Jacqueline Scott Corley
USDC, Northern District of California
San Francisco Courthouse
Courtroom F - 15th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Re: *Waymo LLC v. Uber Technologies, Inc. et al.*, Case No. 3:17-cv-00939

Dear Magistrate Judge Corley:

At yesterday's hearing, it became apparent that there was an issue regarding whether Lior Ron had standing to assert attorney-client privilege over documents that on their face appear to be standard privileged communications. Prior to that discussion, it had been my understanding that the diligenced employees were identifying personal documents and that our clients' rights were not implicated. To the extent the Court concludes that the privilege is one that belongs to Otto or Uber, our clients have not waived that privilege. As the Court knows, Morrison & Foerster has not had access to the documents that have been vaulted by Stroz. Thus, the privilege issues need to be resolved on their merits and not on standing issues. To expedite matters, we have no objection to Special Master Cooper reviewing any such documents to confirm that they are privileged, but want to make it clear to the Court that neither Otto nor Uber have waived any privilege regarding documents at Stroz and expressly reserve the right to claw back any privileged documents that might be identified for production.

Respectfully submitted,



Arturo J. González